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Comments to the Federal Communication Commission proceedings; 94-102

February 15, 2001

Reference: Phase II locational 9-1-1 wavers

Gentlemen:

It is the opinion of this association that all filings by cellular carrier licensees to postpone the implementation of locational 9-1-1 (phase II) technology consider the following:

1. Consider the cost over runs of implementing locational technology in TDMA, and iDEN networks that are converting to UMTS or CDMA-1X for operation in the 3-G Global environment, a valid reason for extension of the time allotted for deployment. As the additional costs would ultimately be born by the public, it is in the best interest of the public that the duplication of technologies be minimized.
2. To be consistent with the public service intent of 94-103, it should be required of all wavers that the licensee agree to implement reverse 9-1-1 service as a condition of the waver. As the technology is currently available for location-specific messaging required for reverse 9-1-1 service, the public as well as the carrier would benefit from the delay in locational 9-1-1 service.

Respectfully submitted

John Richter, director  
CEASassoc

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